

UNITED STATES DISTRICT & BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

515 Rusk Street
Houston, TX 77002

12/16/2019

ATTN: Judge Eduardo V. Rodriguez

United States Courts
Southern District of Texas
FILED

DEC 16 2019

David J. Bradley, Clerk of Court

IN RE: KUNG PROPERTIES LLC (Debtor) , Case No. 19-33739 , Chapter 11

Your Honor,

It has come to our attention as of last week Wednesday, December 11th, 2019 that our lawyer Jessica Hoff has been ordered to no longer take on Chapter 11 cases. We had been trying to reach Ms Hoff for over a month but due to the Thanksgiving holiday we gave leniency. We contacted another lawyer that same morning, Ms. Margaret McClure to consult on our case over over concerns. She then sent us information that showed none of our monthly reports or motion to employ the two realtors we have been working with have been filed. Ms McClure was also the one who sent us the order against Ms Hoff to no longer take on Chapter 11 cases.

I sincerely apologize for the delay in submitting this letter due to being quite sick. We contacted Mr Hector Duran the afternoon of Wednesday to understand the status of our case after finding out one property was granted removal of the stay from our case. We also spoke with Mr Steven (Stephen) who contacted me and suggested I submit something to the court about what we have been going through. This is a letter to explain our experience working with Ms Hoff while we work to figure out a forward plan.

Your Honor, we have been sending our monthly reports to Ms Hoff on schedule with all the attachments monthly. We cannot understand why our reports have not been filed. On our court date back in August when we met Mr Duran, Ms Hoff also received all the information about our two realtors we wanted to employ for a third time. We also cannot believe and understand why the Motion to Employ has not been completed. We have listed 2 properties actively for sale. Ms Hoff continues to blame us for lack of communication when in fact we have all the texts, emails and voicemails the have been sent unreturned.

The properties 9939 Rollinson Park Dr that was granted removal from stay, Your Honor we never received any information pertaining to this property. We contacted the lender directly who confirmed we were not sent documentation directly and it all went to our lawyer, Ms Hoff. She never sent us anything nor did she respond to the request at all. We have since been trying to work with the lender to get payments sent and update them directly. We are not allowed to speak with their attorney and we have asked Ms Hoff to send them a note granting us permission to speak directly.

Your Honor nothing ha been done at all on the part of Ms Hoff. Early November she reached out finally for us to work on our reorganization plan an we completed it. We felt uneasy the whole time because she gave me a current case she is working on to just make our changes and sign. She also decided she would come up with our lawyer fee to add to it even though she said our

case would be a total of \$5k, 16 hours of work. I confronted her about it and she said that was the downpayment only. So I then asked her to show us a breakdown of how many hours she has spent on our case because everything has been us. We have spent all the time working on the petition, monthly reports, reorganization plan and the interfacing with our lenders. Since then we have not been able to get Ms Hoff to give us the status of our monthly reports, property removed from stay or reorganization plan.

Your Honor, the stress of working through our case with no communication knowing how complex it is, has caused us so much illness... I have mentioned to both Mr Duran and Steven that I have since started to shake. Knowing that Ms Hoff has been ordered to not take on anymore cases we would like to no longer have her represent us. Please grant us mercy, Your Honor while we try to figure out a way forward. It has all occurred so suddenly and we are in shock while trying to make sense of the whole situation.

Yours Respectfully,

A handwritten signature in black ink, appearing to read 'Dacia Kung', with a stylized, looping flourish at the end.

Dacia Kung

Managing Member
Kung Properties LLC

12335 KINGSRIDE LN #403
HOUSTON, TX 77024